IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA ALEXANDRIA DIVISION

ROSA SANDOVAL,)
Plaintiff,)
)
V.) Civil Action No. 1:17-cv-01053-AJT-TCB
) Hon. Anthony Trenga
) Discovery Closes February 09, 2017.
STARWEST SERVICES, LLC, et al.)
Defendants.)
)

STARWEST MOTION FOR CIVIL CONTEMPT SANCTIONS/SHOW CAUSE, & COMPEL PLAINTIFF'S COMPLIANCE WITH THE COURT'S JANUARY 12, 2018 ORDER, AND OTHER EQUITABLE RELIEF

Pursuant to Federal Rules of Civil Procedure ("Rules") 37, Defendant Starwest Services, LLC ("Starwest"), by and through counsel, hereby move this Honorable Court for an Order to hold Plaintiff, Rosa Sandoval, in contempt of Court for failure to comply with the Court's January 12, 2018, Order:

Plaintiff failed to obey the Court order despite indicating in December of 2017, that she has produced three years of tax documents to her counsel.

WHEREFORE, Starwest prays that

- 1. Plaintiff produce her 2015 tax return with W2s and 1099s, answer interrogatory number 4, and produce the 2016 W2s; and
- 2. this Court award reasonable attorney's fees and cost for this motion and other relief that this Court deems appropriate.

Dated: January 26, 2018 Respectfully Submitted,

Starwest Services, et al. by Counsel,

/s/ Mohamed E. Seifeldein
Mohamed E. Seifeldein (VSB No. 84424)
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Certificate of Service

I hereby certify that on January 26, 2018, I served the foregoing motion for civil contempt and compel via e-mail, to:

Mr. Randall Sousa, Esq. Attorney for Plaintiff 3007 Williams Dr. Fairfax, VA 22031 703-651-2606 randallsousa@iDefendVA.com

> /s/Mohamed E. Seifeldein (VSB #84424) Seifeldein & Associates, P.C. 6066 Leesburg Pike, Suite 420 Falls Church, VA 22041 Tel: 703-778-6841

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